DAVIS, PARRY, TYLER & WRIGHT

By: Christopher H. Wright, Esquire Attorney I.D. No.: 27091 1525 Locust Street, 14th Floor Philadelphia, PA 19102 (215) 732-3755

Attorney for Defendant Verizon

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KATHY L. OAKES : Civil Action No. 02-2749

:

VS.

:

HENKELS AND McCOY, et al :

ANSWER OF DEFENDANT, VERIZON (FORMERLY KNOWN AS BELL ATLANTIC) TO CROSSCLAIM OF DANELLA CONSTRUCTION CORPORATION AND LEVEL 3COMMUNICATIONS

- Denied. Verizon Pennsylvania Inc., hereby incorporates its answer to Plaintiff's Complaint.
- 2. Denied. Verizon Pennsylvania Inc. specifically denies liability to Plaintiff and further denies joint and several liability to Plaintiff or to Defendants Danella Construction Corporation and Level 3 Communications.

WHEREFORE, Verizon Pennsylvania Inc. denies any and all liability as alleged and requests judgment in its favor.

DAVIS, PARRY, T	<i>TYLER & WRIGHT</i>
-----------------	---------------------------

By:			
CHDICTODIED II	WDICHT	ECOLUDE	

CHRISTOPHER H. WRIGHT, ESQUIRE Attorney for Defendant, Verizon

CERTIFICATE OF SERVICE

I, Christopher H. Wright, Esquire, hereby certify that a true and correct copy of the foregoing Answer of Defendant, Verizon (formerly known as Bell Atlantic) to Crossclaim of Danella Construction Corporation and Level 3 Communications was served on the following counsel of record and unrepresented parties by first class U.S. mail, postage prepaid:

Dennis E. Block, Esquire *Block & Gatusso*Washington Professional Campus 900 Route 168, Suite H1
Turnersville, NJ 08012

Attorney for Plaintiff

Andrew L. Salvatore, Esquire

Kelly, McLaughlin, Foster, Bracaglia,
Daly, Trabucco & White

1617 J. F. Kennedy Blvd., Suite 1690

Philadelphia, PA 19103-1815

Attorney for Henkels & McCoy

Robert C. Mickle, Jr., Esquire *Kennedy, Walker & Lipski* 1818 Market Street, Suite 2510 Philadelphia, PA 19103

Attorney for Danella Construction Co. & Level 3 Communications

Conrad O. Kattner, Esquire *PECO Energy Co. Legal Department* 2301 Market Street, P.O. Box 8699 Philadelphia, PA 19101-8699

Attorney for PECO Energy Company
/ Exelon Communications

Kenneth S. Butensky, Esquire *City of Philadelphia Law Department* One Parkway 1515 Arch Street Philadelphia, PA 19102 Attorney for City of Philadelphia

John O.J. Shellenberger, Esquire *Office of Attorney General* 21 S. 12th Street, 3rd Floor Philadelphia, PA 19107-3603

Attorney for Pennsylvania Department of Transportation

Colette A. Pete, Esquire *Philadelphia Gas Works* 800 W. Montgomery Avenue Philadelphia, PA 19122

Attorney for Philadelphia Gas Works

DAVIS, PARRY, TYLER & WRIGHT

By	:
	CHRISTOPHER H. WRIGHT, ESQUIRE
	Attorney for Defendant, Verizon

Date: July 29, 2002